

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

LOWTECH STUDIOS, LLC, ) CASE NO.: 1:23-cv-1437-DAE  
Plaintiff, )  
v. )  
KOOAPPS LLC, JONATHAN CHANG, and )  
CHUN-KAI WANG, )  
Defendants. )  
\_\_\_\_\_  
KOOAPPS INC., )  
Counterclaim-Plaintiff, )  
v. )  
LOWTECH STUDIOS, LLC and STEVEN )  
HOWSE, )  
Counterclaim-Defendants. )  
\_\_\_\_\_

**JOINT MOTION FOR ENTRY OF AN AMENDED PROTECTIVE ORDER**

Pursuant to Rule 26(c)(1) of the Federal Rules of Civil Procedure, Plaintiff and Counterclaim-Defendant Lowtech Studios, LLC (“Lowtech”), Defendant and Counterclaim-Plaintiff Kooapps Inc., f/k/a Kooapps LLC (“Kooapps”), Defendants Jonathan Chang and Chun-Kai Wang (together with Kooapps, the “Defendants”), and Counterclaim-Defendant Steven Howse (collectively, the “Parties”) hereby jointly request the Court to enter the proposed

Protective Order submitted concurrently herewith. In support of their motion, the Parties state as follows:

Lowtech and Defendants filed a Joint Motion for Entry of a Protective Order on May 23, 2024, which the Court granted on May 24, 2024. ECF No. 29. On January 29, 2025, Lowtech filed a Motion to Compel the production of Snake.io source code, *see* ECF. No. 59, which Defendants opposed on February 5, 2025, *see* ECF No. 62.

On February 20, 2025, the Parties filed a Joint Advisory that outlined the Parties' respective proposals regarding the production of Snake.io source code. ECF No. 74. On February 24, 2025, the Court granted Lowtech's Motion to Compel and ordered Defendants to make Snake.io source code available for Plaintiff's experts' and outside counsel's review during the discovery period. ECF No. 77. The Court ordered that Lowtech's proposals in the Joint Advisory regarding the specifics of source-code production shall govern, and that the Parties "shall confer regarding what, if any, supplemental terms to the protective order are needed to ensure a secure review of the source code." *Id.*

In light of the above, and in light of the extremely sensitive and proprietary nature of source code, the Parties submit that good cause exists for the entry of an amended Protective Order. Accordingly, the Parties respectfully request that the Court enter the proposed Agreed Amended Confidentiality and Protective Order, attached hereto as Exhibit 1.

Date: March 10, 2025

By: /s/ Eli B. Richlin

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on March 10, 2025, all counsel of record who are deemed to have consented to electronic service are being served electronic transmission (email) with a copy of the foregoing Joint Motion for Entry of an Amended Protective Order.

*/s/ Chloe Delehanty*  
Chloe Delehanty